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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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SHERELL HODGE,	§
PLAINTIFF,	§
	§
V.	§ CIVIL CASE NO. 3:23-CV-2048-N-BK
	§
ASHLEY GRAYSON,	§
DEFENDANT.	§

MAGISTRATE JUDGE'S QUESTIONNAIRE

A document titled "Answers to Magistrate Judge's Questionnaire" is attached. The Court perceives the facts set forth in the complaint as inadequate in whole or part to state a claim against Defendant. This Questionnaire gives Plaintiff the opportunity to supplement the complaint with more specific facts in support of the claims alleged. *See Brown v. Taylor*, 829 F.3d 365, 370 (5th Cir. 2016).

Accordingly, Plaintiff is **ORDERED** to answer the questions in the attached document in the space provided for the answers. Plaintiff may attach additional pages to answer the questions fully but may not write on the back of the pages. **Plaintiff is further ORDERED to verify the answers under penalty of perjury by signing on the line at the end of the questions and return the answers to the district clerk <u>by October 13, 2023</u>.**

Failure to file answers to the Questionnaire may result in the dismissal of the action for failure to prosecute.

SO ORDERED on September 22, 2023.

RENEE HARRIS TOLIVER

UNITED STATES MAGISTRATE JUDGE

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ANSWERS TO MAGISTRATE JUDGE'S QUESTIONNAIRE

1. Identify the date(s) (month, day, and year) when Defendant Ashley Grayson acted as alleged in the complaint.

I'm unaware of the exact date she acted as alleged, however I was contacted by Olivia Johnson who acted as a party to the alleged threat on my life on September 27th, 2022. In which she admitted that she was the person that Ashley Grayson sought out to perform the Murder for hire.

On September 27, 2022

- The FBI and Local Police department made me aware of a murder for hire on my life.
- 2. Identify the city and state where the events at issue in the complaint occurred.

Dallas, Tx

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3. Explain why you believe venue is appropriate in the Dallas Division of the Northern District of Texas.

The decision to file my case in the Northern District Court is based on several significant factors that are directly related to the circumstances surrounding my claim, which involve a credible threat to my life and my cooperation with the Federal Bureau of Investigation (FBI):

Jurisdiction and Residence of Defendants: The Northern District Court is the appropriate venue for this case as it encompasses the geographical area where the events giving rise to my claims primarily occurred. Furthermore, some of the individuals implicated in this matter, including those responsible for the alleged threat against my life, reside or conduct business within the Northern District's jurisdiction.

Safety and Security: I wish to emphasize that the FBI has alerted me to a credible and imminent threat to my personal safety. This threat is not limited to a specific location but spans multiple jurisdictions, making it paramount that my legal proceedings take place within a jurisdiction equipped to provide enhanced security measures. The Northern District Court has a proven track record of addressing such security concerns effectively and ensuring the safety of all parties involved.

Expertise and Resources: Given the gravity of the circumstances surrounding my case, I believe that the Northern District Court's experience and resources are vital in managing the complexities involved. The court's familiarity with cases involving federal agencies and security-related matters makes it well-suited to ensure a fair and just resolution.

In view of these compelling reasons, I respectfully request that my case remains within the jurisdiction of the Northern District Court. I believe that this choice is not only justifiable but also necessary to safeguard my well-being and facilitate a fair legal process.

4. The complaint seeks compensatory damages of \$5,000,000. Explain the basis for seeking such amount.

I appreciate the opportunity to clarify the reasons behind my request for \$5,000,000 in damages in light of the threat on my life and the ensuing harm I have endured. This amount is based on a careful consideration of the gravity of the situation and the established legal principles in similar cases.

Compensatory Damages for Emotional Distress and Psychological Harm: The credible threat on my life, the harassment, and the subsequent events have inflicted profound and lasting emotional distress and psychological harm. These experiences have led to severe anxiety, depression, and permanent emotional scars. The request for \$5,000,000 in damages is intended to provide just compensation for the extensive emotional suffering I have endured.

Economic Losses: The threat to my life and the resulting safety precautions have imposed significant economic burdens. I have incurred substantial expenses related to heightened security measures and lost income due to my reduced ability to work effectively.

Deterrence and Equity: It is crucial to consider the need for deterrence in cases involving threats to personal safety and the exercise of one's right to free speech. While I have grappled with the severe consequences of speaking out, the defendant has enjoyed a carefree life, residing in a valuable property and traveling freely. To address this disparity and deter future misconduct, a substantial damages award is warranted.

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5. Unless otherwise provided by statute, federal district courts have subject matter jurisdiction over: (1) federal questions arising under the Constitution, laws, or treaties of the United States, and (2) civil actions between citizens of different states or foreign nations where the amount in controversy exceeds \$75,000, exclusive of interest and costs. See 28 U.S.C. §§ 1331 and 1332(a). Explain why a federal court has the authority to hear your case.

This matter is between citizens of different states as the defendant now resides in North Carolina. The amount of the claim is also more than \$75,000 which gives the court authority to hear the case.

6. In the Civil Cover Sheet, you cite to 18 U.S.C. § 2255 as the basis for your cause of action. Explain why you think 18 U.S.C. § 2255 is applicable to the allegations in this case.

28 U.S.C. § 1332 Diversity-Personal Injury is the correct cause of action in this case, I will amend the civil cover sheet. This was an error on my part. Reason for code: 28 U.S.C. § 1332 Diversity-Personal Injury is due to the amount being over \$75,000 and being citizens of different states.

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STATE OF TEXAS

COUNTY OF Dullas

VERIFICATION

I understand that a false statement or answer to any interrogatory in this cause of action will subject me to penalties for perjury. I declare (or certify, verify or state) under penalty of perjury that the foregoing answers are true and correct. 28 U.S.C. § 1746.

SIGNED on this 10th day of October, 2023.

Signature of Plaintiff)